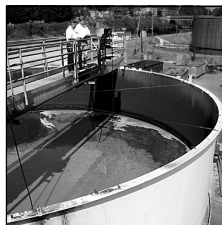


# Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program



**King County**  
Wastewater Treatment Division  
**Industrial Waste Program**

Volume XXVIX Issue 3 Sept. 2004

## Mission Statement

*The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.*

## Industrial Waste Advisory Committee

Kevin Burrell,  
Environmental Coalition of South  
Seattle (ECOSS)  
Ken Gross, GM Nameplate  
Sandy Hallberg, Asko Processing  
Scott Woerman, North Creek Analytical  
Donna Hoskins, Berlex Laboratories  
Bill Hughes, Circuit Partners  
Mike Jeffers, Envirotech Systems  
Kim Niino, Safeway Distribution Center  
Tom Raymond, Honeywell, Inc.  
Steve Skodje, Cargill, Inc.  
Doris Turner, Boeing Commercial  
Airplane Group- Renton  
Chris VanHoof, City of Kent

## 2003 Rewards and Recognition Program

(Awarded in 2004 and listed here throughout that year)

*The King County Industrial Waste Program commends these businesses and facilities for their care protecting the environment by pretreating the industrial wastewater they discharge into the sewerage system.*

## EnviroVation Award

Honeywell International

(continued on page 2)

## King County Biosolids Recycling Program Honored

Since 1969, the Industrial Waste Program has worked with county industries to pretreat wastewater before discharging it into the sewer. The result has been a continuous improvement in water quality and biosolids, with a major decline of undesirable metals in wastewater received by King County sewage treatment plants and in the biosolids produced by the plants.

Thanks in part to the excellent cooperation of county industry in its wastewater pretreatment efforts, King County's Wastewater Treatment Division became, in August, one of the first public wastewater utilities in the United States to receive a prestigious national certification award for its biosolids program. Officials of the U.S. Environmental Protection Agency and National Biosolids Partnership presented the certification to the county.

King County is one of only three public agencies in the nation to earn the Certificate of Achievement following a rigorous, independent third-party verification audit of its biosolids Environmental Management System (EMS).

Jim Sifford, KCIW compliance investigator and biosolids lead commented, "Businesses and regulator partnerships can and do create better ways to manage waste, helping the region to improve its natural resources, including water. Protecting water quality is a sound business investment."

*For more information about the partnership's EMS program, visit its <http://www.biosolids.org/>*

*For more information about the county's Biosolids Recycling Program, visit <http://dnr.metrokc.gov/wtd/biosolids/>*



## Inside this Issue

- Biosolids program honored
- KCIW News Briefs
- KCIW technical assistance class
- EPA audits
- Worker safety
- Enforcement actions

## KCIW News Briefs

### Free Technical Assistance Seminar

KCIW invites you to attend a free, basic information technical assistance seminar entitled "Industrial Waste Discharge Permits 101" to be held November 16 (including optional tour of the newly renovated King County Environmental Lab). Seminar location is Seattle's Fremont area, T.B.A. **To register, go to form on page 4.** Seminar requires a minimum of ten preregistered attendees. (Please note that this event is **not** KCIW's workshop and treatment plant tour that takes place every other year, with the next scheduled for fall, 2005.)

### Upcoming IWAC Meeting, November 3

With the goal of protecting the environment, public health, biosolids quality and King County's regional sewerage system, KCIW's advisory committee meets to exchange ideas among representatives of industrial wastewater dischargers, sewer agencies, environmental groups, and KCIW staff.

The next Industrial Waste Advisory Committee (IWAC) meeting will take place November 3 from 9 a.m. to noon and will be hosted by Berlex Laboratories at 21511 23rd Dr. SE, Bothell. To RSVP, or additional information, please call the KCIW at 206-263-3000.

**The meeting site is wheelchair accessible. Those who have needs or disabilities for which arrangements must be made ahead of time should get in touch with the Industrial Waste Program before a meeting. Telephone (206) 263-3000 (voice) or the Washington Relay Service at 1-800-833-6388 or e-mail: [kristin.painter@metrokc.gov](mailto:kristin.painter@metrokc.gov).**

### Todd Pacific Shipyards Wins BEST Award

In May, KCIW wastewater discharge permittee Todd Pacific Shipyards was one of 11 local businesses honored for their environmental practices by Seattle organization Resource Venture. The BEST (Businesses for an Environmentally Sustainable Tomorrow) Awards celebrate notable "green" achievements by organizations in the greater Seattle area. Todd Pacific Shipyards was honored for its achievements in stormwater pollution prevention.

Resource Venture is a program of the Greater Seattle Chamber of Commerce, in partnership with Seattle Public Utilities. It provides free environmental consulting services to Seattle-area businesses. Since 1990, the Resource Venture has helped thousands of businesses recycle, use less water, prevent stormwater pollution and build sustainably. For further information go to: [www.resourceventure.org](http://www.resourceventure.org) on the internet.

## Commitment-to-Compliance Award

Kenworth Truck Company  
Weyerhaeuser Company

### Gold Award

Acu-Line Corporation  
Alaskan Copper Works – 6th Ave.  
Avtech Corporation  
B.S.B. Diversified Company  
Ball Metal Beverage Container Corp.  
Boeing Commercial Airplane –  
North Field  
Boeing Commercial Airplane – Renton  
Boeing Electronics Center  
BP-Arco Petroleum  
Burlington Environmental  
Burlington Northern/Santa Fe  
Railroad Company  
Carnitech US, Inc.  
Color Tech  
Crane-Eldec Corporation –  
Martha Lake Facility  
Davis Wire Corporation  
Emerald Sanitary Services LLC  
Glacier Northwest  
GM Nameplate, Inc.  
Honeywell International, Inc.  
Industrial Container Services, Inc.  
Industrial Plating Corporation  
Island Spring, Inc.  
Kenworth Truck Company  
King County CIP – Henderson/MLK  
CSO  
Marco Shipyard Seattle, Inc.  
Mastercraft Metal Finishing, Inc.  
Mikron Industries  
Northstar Beverage Company  
Pacific Iron & Metal  
Pepsi-Cola Company  
Philip Environmental Services Corp.  
Precor USA – Plant 1  
Precor USA – Plant 2  
Protective Coatings, Inc.  
Prototron Circuits, Inc.  
Puget Sound Energy  
Rexam Beverage Can Company  
Safeway, Inc. – Beverage Plant  
Seattle FilmWorks Manufacturing /  
PhotoWorks, Inc.  
Seattle Solid Waste –  
Kent Highlands Landfill  
Skills, Inc. (Ballard)

Smith Fabrication, Inc.  
 Surftex Finishes Company  
 Time Oil Company  
 Tri-Way Industries  
 Universal Brass, Inc.  
 Universal Sheet Metal, Inc.  
 Vectra Fitness  
 Viox Corporation  
 Western Metal Arts  
 Western Pneumatic Tube  
 Weyerhaeuser Company

## Silver Award

Aero Controls, Inc. – 20th Street NW  
 Aerojet – General Corporation  
 Amgen Corporation  
 Cedar Grove Composting, Inc.  
 Circuit Partners, Inc.  
 Circuit Services WorldWide LLC  
 Costco Wholesale  
 Crane-Eldec Corporation –  
 North Creek Facility  
 Emerald Recycling  
 Exotic Metals Forming Company  
 Interstate Brands Corporation – Hostess  
 Kerry, Inc.  
 King County CIP – Denny Way CSO/  
 Mercer Tunnel  
 King County Solid Waste –  
 Cedar Hills Landfill  
 Magnetic and Penetrant Services Co.  
 Philips Ultrasound, Inc.  
 Puget Sound Recycling  
 Quality Finishing, Inc.  
 Rabanco Recycling Company  
 Skills, Inc. (Auburn)  
 TTM Technologies, Inc.  
 Universal Manufacturing, Inc.

*Every year, King County recognizes significant industrial users of the sewer system that have maintained an excellent record of compliance with the county's industrial waste discharge regulations for the previous calendar year. For awards criteria and more information, go to <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> on the Web.*

*King County's industrial pretreatment regulations are designed to prevent businesses from discharging substances that can degrade the wastewater treatment process, harm workers, damage facilities or reduce surface-water quality.*

## KCIW News Briefs

### December 15 Deadline for EnvirOvation Award Nominations

KCIW encourages everyone to participate in the nomination process for its annual EnvirOvation Award for excellence in pretreatment. EnvirOvation awardees also become eligible to win one of King County's Green Globe Awards which recognize businesses that have demonstrated outstanding achievements in environmental stewardship. For an application, and to learn about nomination criteria, visit: <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> on the Web, or contact Kristin Painter at 206-263-3000 or email: [kristin.painter@metrokc.gov](mailto:kristin.painter@metrokc.gov).

### Community Meeting: Lower Duwamish Waterway Superfund Site

Learn the latest information about the ongoing cleanup work at the Lower Duwamish site. The meeting will take place October 21, 5:30 – 8:30 p.m. at the South Park Community Center, 8319 8<sup>th</sup> Avenue S., Seattle.

*For further information call Cindy Schuster, 206-553-1815. TTY users, please call 800-877-8339.*



### Federal Toxics Release Inventory (TRI) Report Shows Toxic Releases Continue to Decline

The *Chemicals in Washington State Summary Report 2002* shows a continuing decrease in the amount of toxic chemicals reported released by the 323 industrial facilities in Washington that are required to file the federal report. In the year 2002, 19.8 million pounds of toxic chemicals were reported released to the air, land and water in the state. This was a decrease of 2.5 million pounds from 2001. Since 1994, total releases of all reported chemicals by manufacturing sectors decreased by over 42%.

#### Who must file?

Facilities that are required to file the TRI report are those that meet certain criteria for number of employees, industry category and use of listed chemicals.

The report (*Washington State Department of Ecology publication #04-04-020*) is available at <http://www.ecy.wa.gov/biblio/0404020.html>. A printed copy can be requested by calling 800-633-7585.



**November 16, 2004 – 9:00 a.m.-11:00 a.m. – Seattle’s Fremont area location TBA**

**Who should attend:** Anyone interested in learning more about the King County Industrial Waste Permit. Industry representatives and consultants responsible for submitting the permit application, interpreting the permit contents, sampling and self-monitoring reporting, and recordkeeping.

- Renewing or revising your permit
- Discharge limits & self-monitoring reporting requirements (break-out sessions with your investigator)
- Sampling techniques
- Engineering requirements
- What happens when your company has a violation

***Yes, I would like to attend the workshop:***

Company Name

Phone No. /Area code \_\_\_\_\_

Permit/DA No.

**E-mail address of your contact person (Important):**

Number of People Attending

*Please RSVP to ensure a seat in the class.*

*(Class will be canceled if minimum attendance numbers are not met.)*

**Final registration deadline November 5, 2004**

Please fax this form to: Kristin Painter, 206-263-3001

Or mail to: King County Industrial Waste Program, Attn: Kristin Painter, 130 Nickerson St., Ste. 200, Seattle, WA 98109-1658.

King County will notify you by November 10th if the class is cancelled due to low registration.

Please take a moment, even if you are NOT registering, to give us this feedback:

**Are there other topics, questions, or tours you would like the Industrial Waste Program to address in future classes or workshops? (Please be specific – we appreciate your feedback.)**

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## Industrial Pretreatment Tips:

### Who watches the watchers?

*These tips are presented as cost-effective means of reducing both pollutants and volumes of wastewater discharged into the sewerage system, to protect public health and the environment.*

Industrial/commercial facilities that discharge processing waste into the sewer in our area are familiar with the inspections KCIW conducts on their facilities. But they might not realize that KCIW is also inspected! The most recent audit was conducted by the Department of Ecology (Ecology) in June 2003.

Unlike other environmental programs that rely on the Federal or state governments to implement and enforce specific requirements, the United States Environmental Protection Agency's (EPA's) pretreatment program places the majority of the responsibility on local municipalities. Specifically, section 403.8(a) of the General Pretreatment Regulations states that any publicly owned treatment works (POTW) (or combination of treatment plants operated by the same authority) with a total design flow greater than five million gallons per day, and smaller POTWs with significant industrial users (SIUs), must establish a local pretreatment program.

Nationally, as of 1998, 1,578 POTWs are required to have local pretreatment programs. While this represents only about 15 percent of the total treatment plants nationwide, these POTWs account for more than 80 percent (i.e., approximately 30 billion gallons a day) of the national wastewater flow.

POTW's that administer an approved pretreatment program are the entities that are authorized to control discharges to its system, and are defined in the pretreatment regulations as a "Control Authority."

States authorized by the EPA to operate and/or approve local pretreatment programs are defined by the regulations as "Approval Authorities." Approval authorities are responsible for overseeing the implementation and enforcement of the local programs they have approved.

There are two primary tools approval authorities use to determine if local programs are being operated correctly: (1) an audit, or (2) a pretreatment compliance inspection (PCI). The audit is a comprehensive review of all elements of an approved POTW pretreatment program. The audit addresses all

materials contained in the basic PCI although audit questions are in some instances worded differently, and seek more detailed information. PCI's are more concise and are designed to verify the compliance status of the POTW and focuses primarily on the compliance monitoring and enforcement activities of the POTW. The PCI also attempts to ascertain whether there have been changes to the approved program that have not been reviewed by the approval authority.

Federal pretreatment guidance for approval authorities mandates that audits should be performed initially within one year of pretreatment program approval at the time of NPDES permit reissuance (once every five years). (The initial audit of KCIW was conducted in August 1984 by the EPA.) PCI's are normally performed during intervening years. These are the minimum scheduling requirements for PCIs and audits. Each may be conducted more frequently if circumstances so require.

Following the initial audit, KCIW has received an audit or PCI on a nearly annual basis. In the conclusion of the June 2003 PCI, Ecology stated: "King County continues to conduct an exceptionally comprehensive and well-managed industrial pretreatment program. King County Industrial Waste has been nominated for the EPA Clean Water Act Recognition Award which acknowledges programs that demonstrate a commitment to protecting and improving the Nations' waters."

*For further information consult the Code of Federal Regulations published by the Office of the Federal Register, National Archives and Records Administration.*

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## Industrial Pretreatment Tips: Why Worker Safety is one of our goals

*These tips are presented as cost-effective means of reducing both pollutants and volumes of wastewater discharged into the sewerage system, to protect public health and the environment.*

A July 2004 copyrighted article by the Environmental News Service contained the following headline: "Guilty Plea: Furniture Stripping Chemicals Burn Sewer Worker."

The article detailed the conviction of a furniture stripping company owner for illegally storing solvents and acids, some of which reached the sewer system causing fumes that overcame a sewer maintenance worker who suffered cardiac arrest. In the process, the worker's clothes also came in contact with wastes and caused serious burns. Rescue personnel were able to resuscitate the worker.

These consequences could have been easily avoided if the furniture stripping company had properly stored, and then disposed of these wastes. While the injury of sewer maintenance personnel by an illegal industrial discharge is infrequent, the

prevention of such injuries is one of the goals of federal, state, and local regulations.

Preventative actions the company could have taken include: storing hazardous chemicals in bermed, no-outlet areas; disposing of chemicals off-site in conformance with state and federal regulations; and, if it can be done consistently with local discharge regulations, neutralizing and disposing of acids on site.

The actions by the above company were a violation of both federal and local regulations, and easily preventable. In such instances it is likely that the business owner would be sentenced to federal prison and/or receive a substantial fine. Maximum sentences are up to five years in prison and a \$250,000 fine.

Several companies in the Puget Sound region have been the subject of criminal action for the illegal disposal of hazardous waste and received substantial fines on jail time. At least two of these cases involved illegal disposal to the King County sewer system.

*If you have any questions on what can be legally disposed to the sewer system, please contact KCIW. Contact information on page 1.*

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## Publication of recent enforcement actions

King County's Industrial Waste Program is responsible for making sure that water used by county industries returns to our waterways clean and safe. This protects our water resources, our public health, workers at treatment plants, and the biosolids produced there.

The vast majority of King County's businesses do an excellent job of meeting these clean water goals by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as federal regulations require.

The following companies are users of the county sewer system that violated treatment requirements between June and August 2004 (or have not had their violations previously published) and either:

- were found in significant noncompliance during the reporting period; and/or
- received fines, and/or
- had violations that were unique or warranted special attention.

**Electrofinishing, Inc.**  
**22630-88<sup>th</sup> Avenue S., Unit A**  
**Kent, Washington 98031**

**Nature of Violation/ Type of Pollutant:** Late report-permit renewal application.

*(continued on page 7)*

**Basis for Publication:** Significant noncompliance for failure to file the application for renewal of its waste discharge permit within 30 days of the due date.

**Comments:** Electrofinishing, Inc. filed its permit application, no further action required.

**Penalty:** Final Notice to file its permit application and notice of significant noncompliance.

**King's Command Foods, Inc.**  
**7622 S. 188<sup>th</sup> Street**  
**Kent, Washington 98032**

**Nature of Violation/ Type of Pollutant:** Permit violations (1) Failure to install pretreatment system per approved plan; (2) Exceeded the authorized maximum volume (three instances). Discharge violation: discharge of acidic waste.

**Basis for Publication:** Had a violation that warranted a fine.

**Comments:** King's Command Foods, Inc. has upgraded its pretreatment system.

**Penalty:** \$2,000 fine and \$1,785 post-violation charge, and compliance schedule.

**Washington State Ferries**  
**Coleman Dock**  
**801 Alaskan Way-Pier 52**  
**Seattle, Washington 98121**

**Nature of Violation/ Type of Pollutant:** Failure to perform the required self-monitoring for hydrogen sulfide from November 1999 to April 2004.

**Basis for Publication:** Significant noncompliance for failure to file a required report within 30 days of its due date.

**Comments:** Washington State Ferries (Coleman Dock operation) has researched for the appropriate equipment for conducting self-monitoring for hydrogen sulfide. The self-monitoring started in June 2004 and the self-monitoring reports will be submitted by the due dates.

**Penalty:** \$1,450 post-violation charge and compliance schedule.

**WestFarm Foods (Darigold)-Issaquah**  
**611 Front Street**  
**Issaquah, Washington 98027**

**Nature of Violation/ Type of Pollutant:** Permit violation-failure to notify King County of a spill or slug discharge.

**Basis for Publication:** Had a violation that warranted a fine.

**Comments:** WestFarm Foods has posted procedures to assure its audible pH alarm is on at all times, that the alarm will reset in the event it is shut off and that an immediate investigation is conducted to identify the source of the alarm.

**Penalty:** \$3,442 fine, \$1,470 post-violation charge and compliance schedule.

**Other Enforcement Actions** King County Industrial Waste also acted on four other violations at four companies for the following pollutants and/or parameters: late reports (3); pH-Acidic (1).

We all need to work together to prevent pollution. If you have information for the Industrial Waste Program or questions about our programs, please call (206) 263-3032 or 711, TTY Relay Service. You may also visit our program's pages at <http://dnr.metrokc.gov/wlr/indwaste/index.htm> on the Internet.

*King County's Wastewater Treatment Division protects public health and water quality by serving 18 cities, 15 sewer districts and more than 1.4 million residents in King, Snohomish and Pierce counties. The regional public utility has been preventing water pollution for nearly 40 years.*



## Clean Water: A Sound Investment

**This information is available on advance request in accessible formats for persons with disabilities. Please call 206-263-3000 or TTY relay service at 1-800-833-6388.**

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